

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 04-30034-MAP
)
 MICHAEL CROOKER,)
 Defendant.)

Government's Motion to Extend Time for One Week

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that the Court extend the government's time to file its memorandum in opposition to Mr. Crooker's additional motions for one week, until February 24, 2006.

Mr. Crooker has filed additional pretrial motions, including a Motion to Dismiss Indictment Due to the Unforeseeably Expansive Interpretation Doctrine which was filed on February 9, 2006. The Court had previously ordered the government to respond to Mr. Crooker's motions by today, February 17, 2006. Due to the recent departure of Assistant U.S. Attorney Ariane Vuono and other work in the office, the government has been unable to complete its response to Mr. Crooker's motions. The government should be able to do so by February 24th.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

by: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Date: February 17, 2006

Certificate of Service

February 17, 2006

I certify that I caused the foregoing document to be served on counsel for the defendant, Vincent Bongiorno, Esq, 95 State Street, Springfield, MA 01103.

/s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney